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Attorneys for Plaintiff  
 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

YURI KHATCHIKYAN, et al.,

Defendants.

CR 2:24-cr-00214 -MEMF

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING INDICTMENT AND  
RELATED DOCUMENTS; DECLARATION OF  
KATHRYNNE N. SEIDEN

**(UNDER SEAL)**

The government hereby applies ex parte for an order that the  
 indictment and any related documents in the above-titled case (except  
 the arrest warrants for the charged defendants(s)) be kept under seal  
 until either defendant's initial appearance in this matter, at which  
 point the indictment and related documents shall be automatically  
 unsealed.

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1        This ex parte application is made pursuant to Federal Rule of  
2 Criminal Procedure 6(e)(4) and is based on the attached declaration  
3 of Kathrynne N. Seiden.

4        Dated: March 28, 2024

Respectfully submitted,

5                                E. MARTIN ESTRADA  
6                                United States Attorney

7                                CAMERON L. SCHROEDER  
8                                Assistant United States Attorney  
9                                Chief, National Security Division

/s/

10                               

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KATHRYNNE N. SEIDEN  
11                               Assistant United States Attorney

12                               Attorneys for Plaintiff  
13                               UNITED STATES OF AMERICA  
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**DECLARATION OF KATHRYNNE N. SEIDEN**

I, Kathrynne N. Seiden, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Khatchikyan et al., the indictment in which is being presented to a federal grand jury in the Central District of California on March 29, 2024.

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on March 29, 2024. The likelihood of apprehending one or more of the charged defendants might be jeopardized if the indictment in this case were made publicly available before defendants are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and has his or her initial appearance.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on March 28, 2024.

/s/

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KATHRYNNE N. SEIDEN